

8. Is the system operated by a contractor?

☒ No.

☐ Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI.

9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

☐ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

☒ YES If yes, please indicate the following, if known:

Provide date of last C&A certification/re-certification:  
04/26/2010

Confidentiality: ☐ Low ☐ Moderate ☒ High ☐ Undefined

Integrity: ☐ Low ☐ Moderate ☒ High ☐ Undefined

Availability: ☐ Low ☐ Moderate ☒ High ☐ Undefined

☐ Not applicable -- this system is only paper-based.

10. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)?

☒ NO

☐ YES If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?

☐ NO

☒ YES

12. Status of System/ Project:

☐ This is a new system/ project in development.

## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 06/18/1996

2. Has the system/project undergone any significant changes since April 17, 2003?

\_\_\_\_\_ NO [If no, proceed to next question (II.3).]

☒ YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

\_\_\_\_\_ A conversion from paper-based records to an electronic system.

\_\_\_\_\_ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

☒ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

☒ A change that results in information in identifiable form being merged, centralized, or matched with other databases.

\_\_\_\_\_ A new method of authenticating the use of and access to information in identifiable form by members of the public.

\_\_\_\_\_ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

\_\_\_\_\_ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.

\_\_\_\_\_ A change that results in a new use or disclosure of information in identifiable form.

\_\_\_\_\_ A change that results in new items of information in identifiable form being added into the system/project.

☒ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

\_\_\_\_\_ Other [Provide brief explanation]:

3. Does a PIA for this system/project already exist?

☒ NO ☐ YES

If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA?

☐ NO ☐ YES

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FOI/PA  
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(OGC/PCLU (Rev. 05/15/09))

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(Equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT: [REDACTED]

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Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: SSA [REDACTED]	Name: [REDACTED]
Reason:	Program Office:	Phone: [REDACTED]
Declassify On:	Division: CID/FCS	Room Number: 7458
	Phone: [REDACTED]	
	Room Number:	

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### FBI DIVISION INTERMEDIATE APPROVALS (complete as necessary consonant with Division policy)

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: CID	Signature: /s Date signed: 11/17/2009 Name: Sharon E. Ormsby Title: Section Chief	Signature: /s Date signed: 11/17/2009 Name: [REDACTED] Title: CID Privacy Officer
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7338).  
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

Upon final FBI approval, FBI OGC/PCLU will distribute as follows:

1 - Signed original to file 190-HQ-C1321794 (fwd to JEH 1B204 via PA-520)

Copies (recipients please print/reproduce as needed for Program/Division file(s)):

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to  
privacy@usdoj.gov)

(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940,  
20530)

2 - FBI OCIO / OIPP (JEH 9376, attn: [REDACTED])

1 - FBI SecD/AU (elec. copy; via e-mail to UC [REDACTED])

1 - RMD/RMAU (attn: [REDACTED])

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet  
1 - PCLU UC  
1 - PCLU Library  
1 - PCLU Tickler

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**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:** [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

\_\_\_\_ PIA is required by the E-Government Act.

\_\_\_\_ PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? \_\_\_\_ Yes. \_\_\_\_ No (indicate reason):

\_\_\_\_ PIA is not required for the following reason(s):

\_\_\_\_ System does not collect, maintain, or disseminate PII.

\_\_\_\_ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

\_\_\_\_ Information in the system relates to internal government operations.

\_\_\_\_ System has been previously assessed under an evaluation similar to a PIA.

☒ No significant privacy issues (or privacy issues are unchanged).

\_\_\_\_ Other (describe):

Applicable SORN(s): \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3? \_\_\_\_ No \_\_\_\_ Yes--See sample EC on PCLU intranet website here:  
[http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

SORN/SORN revision(s) required? \_\_\_\_ No \_\_\_\_ Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? \_\_\_\_ No \_\_\_\_ Yes (indicate forms affected):

**RECORDS.** The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

Other:

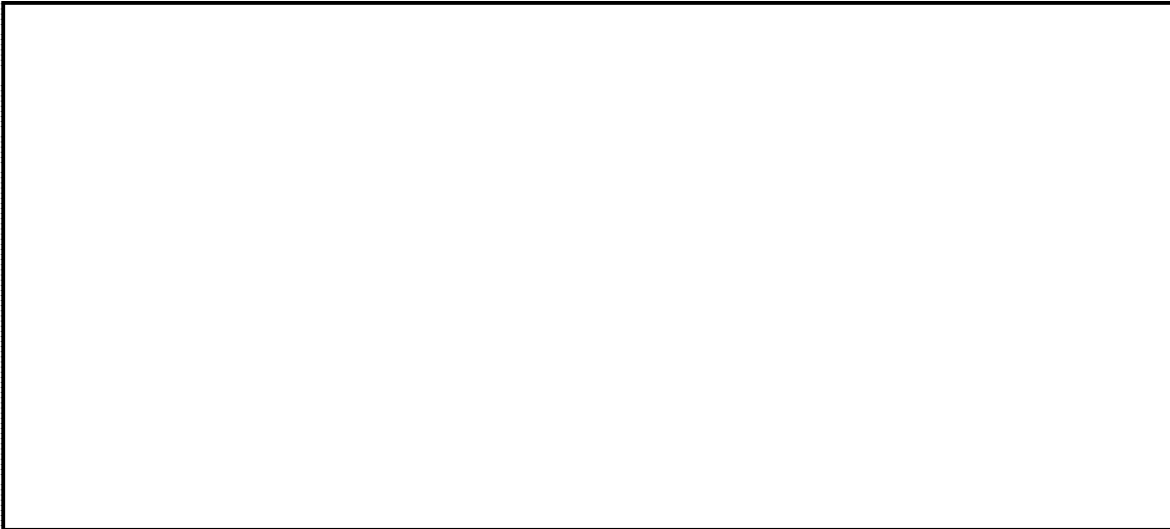
David C. Larson, Deputy General Counsel  
FBI Privacy and Civil Liberties Officer

Signature: \_\_\_\_\_  
Date Signed: 3/3/10

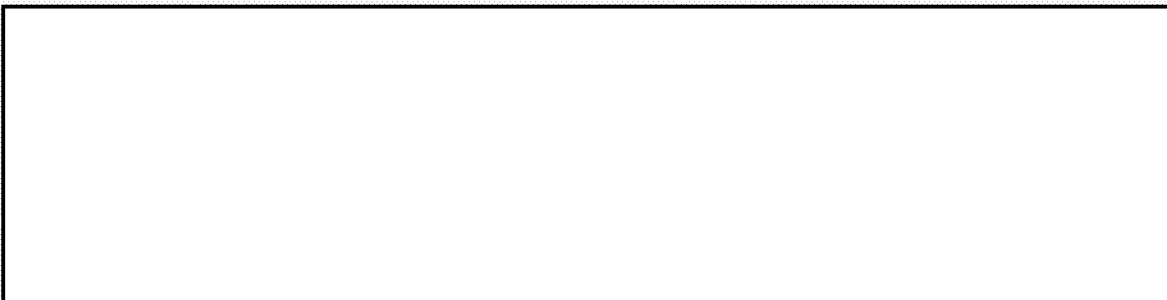
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**I. INFORMATION ABOUT THE SYSTEM / PROJECT**


1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):



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 The FBI is one of many users, along with state, local, and other federal law enforcement and regulatory agencies.

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[Redacted]

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[Redacted]

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[Redacted]

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The information will be aggregated and disaggregated in various combinations with other lawfully obtained information, to support the FBI's criminal, counterterrorism and counterintelligence operations.

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

\_\_\_\_\_ NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

\_\_\_X\_\_\_ YES [If yes, please continue.]

3. Does the system/project pertain only to government employees, contractors, or consultants?

\_\_\_X\_\_\_ NO \_\_\_\_\_ YES

4. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

\_\_\_\_\_ NO \_\_\_X\_\_\_ YES

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5. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project?

\_\_\_\_\_ NO \_\_\_\_\_X\_ YES If yes, check all that apply:

\_\_\_X\_\_\_ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

\_\_\_\_\_ SSNs are necessary to identify FBI personnel in this internal administrative system.

\_\_\_\_\_ SSNs are important for other reasons. Describe:

\_\_\_\_\_ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

\_\_\_X\_\_\_ It is not feasible for the system/project to provide special protection to SSNs. Explain:

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Information retained at the FBI is incorporated within the relevant investigative case file and handled in accordance with the rules governing the use of Central Records System (CRS) records.

6. Does the system/project collect any information directly from the person who is the subject of the information?

\_\_\_X\_\_\_ NO [If no, proceed to question 7.]

\_\_\_\_\_ YES

a. Does the system/project support criminal, CT, or FCI investigations or assessments?

\_\_\_\_\_ YES [If yes, proceed to question 7.]

\_\_\_\_\_ NO

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?

\_\_\_\_\_ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

\_\_\_\_\_ YES Identify any forms, paper or electronic, used to request such information from the information subject:

7. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

\_\_\_\_\_ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

\_\_\_X\_\_\_ YES If yes, provide date of last C&A certification/re-certification:

[redacted] received C&A certification on 05/14/2009 (319U-HQ-A1487677-SECD, serial 1660

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\_\_\_\_\_ Don't Know.

8. Is this system/project the subject of an OMB-300 budget submission?

\_\_\_X\_\_\_ NO

\_\_\_\_\_ Don't know

\_\_\_\_\_ YES If yes, please provide the date and name or title of the OMB submission:

9. Is this a national security system (as determined by the SecD)?

\_\_\_X\_\_\_ NO

\_\_\_\_\_ YES

\_\_\_\_\_ Don't know

10. Status of System/Project:

\_\_\_\_\_ This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? Prior to 2003
2. Has the system/project undergone any significant changes since April 17, 2003?

\_\_\_\_\_ NO [If no, proceed to next question (II.3).]

☒ YES If yes, indicate which of the following changes were involved (mark all boxes that apply):

\_\_\_\_\_ A conversion from paper-based records to an electronic system.

\_\_\_\_\_ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

\_\_\_\_\_ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

\_\_\_\_\_ A change that results in information in identifiable form being merged, centralized, or matched with other databases.

\_\_\_\_\_ A new method of authenticating the use of and access to information in identifiable form by members of the public.

\_\_\_\_\_ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

\_\_\_\_\_ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.

\_\_\_\_\_ A change that results in a new use or disclosure of information in identifiable form.

\_\_\_\_\_ A change that results in new items of information in identifiable form being added into the system/project.

☒ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

☒ Other [Provide brief explanation]:

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[redacted] as described in this PIA.

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3. Does a PIA for this system/project already exist?

☒ NO ☐ YES

The system described herein is [redacted]

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If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA?

☐ NO ☐ YES

[The PIA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

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